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March 17, 2015

**BY ECF**

Honorable Vernon S. Broderick  
United States District Court Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Wiles v. City of New York, 13-cv-2898 (VSB)

Dear Honorable Judge Broderick

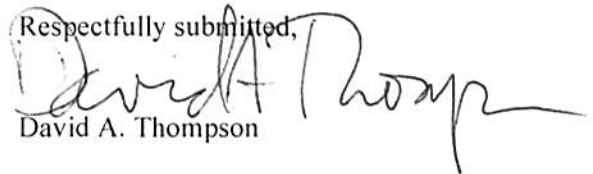
We are approaching the one year anniversary of the defendants' first motion for summary judgment. There are at least three attorneys from the Office of Corporation Counsel actively working on this case. The present motion schedule was set not long ago. The defendants already have a complete memorandum of law, 56.1 statement, and assembled exhibits to work from. The discovery had since that motion was filed – although contentious – has not been voluminous, and had not fundamentally transformed the factual landscape or the legal issues at hand.

I have another case in which a motion for summary judgment will be filed on April 2, 2015, and for which my opposition papers will be due May 4<sup>th</sup>. Without the defendants' requested modification of the schedule, there was already some overlap in these two briefing schedules. The defendants' request reduces the amount of time I have to work on this response before the second motion is served upon me. I am the only attorney in my office actively working on both cases. The requested modification of the schedule will be burdensome on my office.

I respectfully request that the Court deny the extension of time, or, in the alternative, grant leave to the defendants to file their motion on March 27<sup>th</sup>, and modify the schedule so that

the plaintiff's opposition will be due on May 10<sup>th</sup>. This would alleviate the burden on my office which would otherwise be caused by the defendants' request.

Respectfully submitted,

  
David A. Thompson